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July 6, 2023

**VIA ECF**

Magistrate Judge Peggy Kuo  
United States District Court  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, NY 11201

**Re:               Roofers, Waterproofers & Allied Workers Local Union No. 8  
                     Annuity Fund, et al vs. AWE Incorporated. et al**  
**Index No.:     22-cv-07833-AMD-PK**

Dear Magistrate Judge Kuo:

I write as counsel for the Plaintiffs, Roofers, Waterproofers & Allied Workers Local Union No. 8 Annuity Funds, et al in the above referenced action, to provide a status report as per your May 15, 2023 Order.

As you are aware, Defendants AWE Incorporated and Isufi Kujtim have not appeared in this action. A representative of Defendants, Ema Gjona, participated in our Initial Conference call and has been working toward providing the documentation required to reach a resolution of this matter. Ms. Gjona has provided a portion of the documentation and anticipates being able to provide the balance by mid-August. Plaintiffs anticipate needing approximately 30 days to complete review of what will be received.

Additionally, the parties plan to enter into a preliminary payment agreement to address established undisputed contributions due. Defendants' payment plan proposal is expected tomorrow or early next week.

Respectfully submitted,

/s/ Sylvie Straus-Figueroa  
Sylvie Straus-Figueroa, Esq.